

Katten

Katten Muchin Rosenman LLP

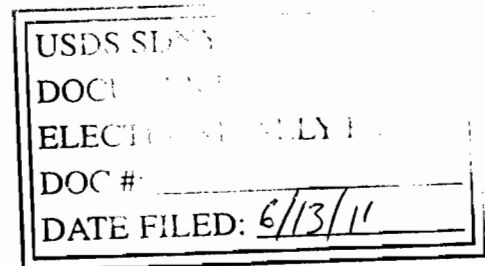
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June 10, 2011

MEMO ENDORSED

Via Email

Honorable Richard J. Sullivan
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007



Re: *Vancil v. Sugarman, et al.*, Civil Action No. 10-CV-4312

Dear Judge Sullivan:

Counsel for the parties in this matter jointly submit this letter in accordance with the Court's June 2, 2011 Order directing the parties to propose a joint discovery and briefing schedule for Phase I discovery, as set forth in the parties' May 31, 2011 joint letter. The parties agree that Phase I discovery can be completed within 90 days of the execution and entry of an appropriate confidentiality protective order, pursuant to the following schedule.

Within 10 days of the Court's approval of a Phase I discovery schedule, the parties shall submit a stipulated confidentiality protective order for the Court's approval or a joint letter identifying any disputes relating to the protective order.

Defendants shall complete their production of requested Phase I documents within 20 days of the entry of a confidentiality protective order. Defendants shall produce any privilege logs as may be required to identify and set forth the foundation for withholding responsive documents within 30 days of the entry of the protective order. The parties shall present to the Court any issues arising out of defendants' document production and log they are unable to resolve within 20 days of the completion of defendants' document production or privilege log, whichever is later.

Within 35 days of the completion of Phase 1 discovery, Defendants shall file their motion to terminate the litigation. Plaintiff shall have 35 days thereafter to file her brief in opposition, and defendants shall have 20 days thereafter to file their reply.



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Should the Court wish to discuss any of the aforementioned matters, the parties will make themselves available at the Court's convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David H. Kistenbroker".

David H. Kistenbroker
Katten Muchin Rosenman, LLP
Counsel for Nominal Defendant iStar Financial, Inc.

Scott B. Schreiber
Arnold & Porter LLP
Counsel for Individual Defendants

Craig W. Smith
Robbins Umeda LLP
Counsel for Plaintiff Addie Vancil

SO ORDERED.
Dated: A handwritten signature in black ink, appearing to read "Richard J. Sullivan".
6/10/11 RICHARD J. SULLIVAN
U.S.D.J.

IT IS HEREBY ORDERED THAT: (1) the parties shall submit a proposed confidentiality order no later than June 20, 2011; (2) Phase I discovery is to be completed no later than September 19, 2011; and (3) if either party contemplates a motion upon the close of Phase I discovery, pre-motion letters are to be submitted no later than September 19, 2011.